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Attorney for: Thrift Investment Corporation

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:)	
)	Case No. 22-18303(RG)
ALEXANDRE J. DACOSTA)	
)	CHAPTER 11
VIVIANNE C. ANTUNES)	
)	Hearing Date:
)	CERTIFICATION IN SUPPORT OF
)	MOTION OF THRIFT INVESTMENT
)	CORPORTAION FOR RELIEF FROM THE
)	AUTOMATIC STAY

MICHELLE KERZIC certifies as follows:

1. I am employed by Thrift Investment Corporation as an internal manager and am familiar with the facts of this case.
2. On 8-19-2022 the debtor executed a Retail Installment Sale Agreement for the purchase of a 2013 Porsche Cayenne GTS more particularly described in the following paragraph. The contract was assigned to Thrift Investment Corporation and the debtors became indebted to Thrift Investment Corporation in accordance with the terms of same. To secure payment of the title to the vehicle was delivered to Thrift Investment Corporation with Thrift named as first lienholder. As a result, Thrift Investment Corporation is the holder of a first

purchase money security interest encumbering the vehicle. True copies of the contract and title are annexed hereto.

3. The following information sets forth the make, model and serial number of the vehicle, the original terms of the contract, the average retail and trade-in value of the vehicle, and the current status of the debtors' account:

A. Make, model and serial number of motor vehicle:

2013 PORSCHE CAYENNE GTS

Serial number: WP1AD2A25DLA79625

B. Original contract terms:

(i) Total of payments: \$36,929.10

(ii) Term: 30 months

(iii) Monthly payment: \$1,230.97

(iv) First payment due: 9-19-2022

C. Clean retail value: \$29,300.00*

Average Trade-In: \$23,325.00

*Value derived from NADA Official Used Car Guide, December 2022

Delinquency status: As of 12-21-2022, 9-19-2022 through 12-19-2022

Total Arrears: \$4,953.88

Pre-Petition Arrears: \$1,240.97 (this amount includes late charges of \$10.00)

Post-Petition Arrears: \$3,712.91 (this amount includes late charges of \$20.00)

E. Statement of amount due

- i. Net balance: \$33,448.60 plus all counsel fees associated with this motion in accordance with 11 U.S.C. 506(b) as of 1-330-21

4. The vehicle is currently not titled under the debtor's names. The original title is being held by Automotive Finance Corp. (a listed creditor in debtors' case). Since AFC did not release this title to us, the debtors are required to apply for a New Jersey title through the Dealer out of Business Unit at New Jersey Motor Vehicle Commission. Required documents were mailed to the NJMVC on 12-22-2022 (tracking # 7016 0910 0000 7747 8069). We, as lienholders, expect to receive the NJ title in a month or so.

5. Thrift Investment Corporation demands relief from the automatic stay for the following reasons:

- a. The Debtor is failing to make payments to Thrift Investment Corporation and is failing to provide Thrift Investment Corporation with adequate protection.

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

Dated: 12/29/22.


MICHELLE KERZIC

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) Morton & Craig LLC 110 Marter Ave. Suite 301 Moorestown, NJ 08057 Attorneys for Thrift Investment Corporation
In Re: ALEXANDRE J. DACOSTA VIVIANNE C. ANTUNES

Case No.: 22-18303

Hearing Date:

Chapter: 11

Judge: RG

**CERTIFICATION OF SECURED CREDITOR REGARDING POST-PETITION
PAYMENT HISTORY ON VEHICLE LOAN/LEASE**

Michelle Kerzic of full age, employed as Bankruptcy Specialist by
Thrift Investment Corporation, hereby certifies the following information:

Vehicle lender/lessor: Thrift Investment Corporation

Vehicle description: 2013 Porsche Cayenne GTS

POST-PETITION PAYMENTS RECEIVED (Petition filed on 10-19-2022)

Amount due	Date Payment due	Date payment received	Amount received	How payment applied (mo./yr)	Type of payment (See Legend below)
1. 1,230.97	10/19/2022				
2. 1,230.97	11/19/2022				
3. 1,230.97	12/19/2022				
4.					
5.					
6.					
7.					
8.					

Amount due	Date Payment due	Date Payment received	Amount Received	How Payment applied (mo./yr)	Type of Payment (See Legend below)
9.					
10.					
11.					
12.					
Total 3,692.91			0.00		

(Continue on attached sheets if necessary)

Monthly payments past due @ \$ 1,230.97 per month from 9/19/2022 to 12/19/2022 :
\$ 3,692.91

Plus miscellaneous amounts due:

Late Charges: \$ 20.00
Repossession fees: \$
Extension fees: \$
Other : \$

TOTAL POST-PETITION PAST DUE..... \$ 3,712.91

Pre-petition arrears: 09/19/2022 to
(1 months x \$ 1,240.97 per month = \$ 1,240.97)

Legend: MP = monthly payment; EXF = Extension fee; LC = Late Charge O = Other*specify other payments received

I certify under penalty of perjury that the foregoing is true and correct.

12/29/22
Date of signature


Signature